

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

BANCO POPULAR DE PUERTO RICO  
Plaintiff

CIVIL NO. 01-1142(GAG)

v.

LATIN AMERICAN MUSIC CO, INC, et al  
Defendants

.....

MOTION TO CORRECT ATTACHMENT OF STATEMENT OF  
UNCONTESTED MATERIAL FACT

TO THE HONORABLE COURT

COMES NOW, Guillermo Venegas Lloveras, Inc. ( GVLI) , by and through  
the undersigned counsel and respectfully avers and prays as follows:

- 1- GVLI presented a Statement of Uncontested Material Facts with the  
corresponding exhibits as attachments. Dkt 338 which accompanies the  
Motion for Summary Judgment filed in the instant case. Dkt 336.
- 2- In reviewing the Statement GCLI became immediately aware that exhibit 1  
notwithstanding the proper title did not contain the correct document.
- 3- The Statement of Material Facts identified Exhibit 1 as Banco Popular's  
complaint. However the document attached was the Answer to Counterclaim  
of Guillermo Venegas Lloveras, INC. filed by BPPR.

4- Attached to this motion is the correct document – Banco Popular’s  
Complaint - As exhibit 1 of the Statement of Uncontested Material Facts.

5-GVLI understands that the adverse parties are not prejudiced by the correct  
filing. The pertinent uncontested statements numbers 1,2, 4 and 5 are in no  
manner modified. These identify the source of the statements and  
the pertinent parts of the complaint .

6- Attached to this motion is the correct document – Banco Popular’s  
Complaint - as exhibit 1 of the Statement of Uncontested Material Facts.

WHEREFORE , it is respectfully requested that this Honorable Court grant this  
Motion to Correct the Attachment of the Statement of Uncontested material Facts.

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this date I electronically filed the foregoing with the  
Clerk of the Court through the CM/ECF system which will send notification to the  
attorneys of record.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this August 29, 2009.

*Signed/Josè L Barreto -Rampolla*  
Josè L. Barreto Rampolla  
Attorney for Guillermo Venegas Lloveras Inc.  
USDC NO. 202311  
PO Box 9023880  
San Juan, Puerto Rico 00902-3880  
Tel 787-724 6398  
Fax 787-725-1974  
[barretojose@microjuris.com](mailto:barretojose@microjuris.com)